



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

November 21, 2014

Christopher Calfee
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Subject: SB 743 Guidelines

Dear Mr. Calfee:

On behalf of Bay Area Air Quality Management District (Air District) staff, I am writing in support of the Governor's Office of Planning and Research's (OPR's) proposed updates to the transportation impacts analysis in the California Environmental Quality Act (CEQA) Guidelines (issued August 6, 2014). The proposed updates represent exciting progress by the state to provide guidance for more accurately characterizing the potential transportation impacts from new development subject to CEQA.

Senate Bill (SB) 743 directs OPR to amend the CEQA Guidelines to provide an alternative to level of service analysis for evaluating transportation impacts. The alternative criteria must, "promote the reduction of greenhouse gas emissions, the development of a multimodal transportation network, and a diversity of land uses" (New Public Resources Code Section 21099(b)(1)). These stated goals align with the Air District's mission to protect the public's health from poor air quality, and our goal to reduce greenhouse gas (GHG) emissions. In November 2013, the Air District's Board of Directors adopted a climate stabilization goal of an 80 percent GHG emissions reduction below 1990 levels by 2050. To achieve this goal, as well as the state's 2050 GHG goal, it is imperative to effectively reduce emissions from the transportation sector, the largest contributor to GHG emissions in the Bay Area and state. Air District staff agrees with OPR's recommendation that vehicle miles traveled (VMT) be used as the criterion to measure transportation impacts under CEQA. A VMT approach will effectively change how transportation impacts are mitigated by moving from reducing traffic delay due to a level of service analysis to reducing vehicle use and therefore GHG emissions and other air pollutants. We are hopeful that a VMT approach will support more livable, transit-oriented communities and improve air quality in the Bay Area.

Thank you for the opportunity to provide comments on this effort. We look forward to working with OPR in implementing the proposed updates in the Bay Area.

Sincerely,

Jean Roggenkamp
Deputy Air Pollution Control Officer

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